

1/5/2009 Huber, Elisabeth

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF MINNESOTA

3 LeMOND CYCLING, INC.,

4 Plaintiff,

5 vs.

Case No. 08-1010

6 TREK BICYCLE CORPORATION,

7 Defendant/Third-Party

8 Plaintiff,

9 vs.

10 GREG LeMOND,

11 Third-Party Defendant.

12
13
14
15 Video Deposition of ELISABETH HUBER
16 Monday, January 5th, 2009
17

18 9:33 a.m.

19 at

20 GASS WEBER MULLINS, LLC
21 309 North Water Street, Suite 700
22 Milwaukee, Wisconsin 53202

23 Reported by Julie K. Lyle, RPR/RMR/CRR
24
25

EXHIBIT
I

1/5/2009 Huber, Elisabeth

1 individuals, and I'll start with Warren. Were
2 there ever any problems with transactions handled
3 by Warren Gibson --

4 A I never had --

5 Q -- that you recall?

6 A -- personally any problems with Warren at all.

7 Q Were there ever any transactions that raised a
8 question or a concern at Trek, to your knowledge?

9 A Not that I'm aware of.

10 Q What about Muffy?

11 A None. No problems at all.

12 Q What about Bernie?

13 A Same. No problems at all.

14 Q How did you know about Mr. LeMond's ability to
15 buy Trek products at employee discount pricing?
16 Just in -- just due to your position and what you
17 were being asked to do?

18 A When I was approached to take over the position,
19 it was explained to me that he at that juncture
20 was allowed ten free bicycles a year as part of
21 his contract and that then he would often
22 purchase products for friends or media contacts,
23 sometimes a touring company person, and then he
24 also would personally choose to sponsor some
25 teams and extend his discount to them.

1/5/2009 Huber, Elisabeth

1 Q Do you recall who explained this to you?

2 A Laurie Koch and Dean Gore.

3 Q How frequently would you say Trek shipped

4 products purchased to people other than

5 Mr. LeMond but that were Mr. LeMond's employee

6 pricing purchases?

7 It's a terrible question. Do you

8 understand it?

9 A Yeah, I do understand it.

10 I've never tallied it up. I

11 would -- so I -- I don't know that I could give

12 you a distinct number.

13 Q What -- could you guess a percentage of the total

14 bikes that Mr. LeMond purchased using employee

15 pricing?

16 A That went to others?

17 Q Correct.

18 A I would probably say close to 70 percent went to

19 others.

20 Q Are you aware of instances where bikes purchased

21 on Mr. LeMond's account were resold?

22 A No, I'm unaware of anything specifically.

23 Q Do you have an understanding of the involvement

24 of the dealers in Mr. LeMond's use of the

25 employee discount program?